

Hon. Ricardo S. Martinez

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

PAUL SCOTT, an individual,

Plaintiff,

v.

CALEB CARR, individually; and VITA  
INCLINATA TECHNOLOGIES INC., a  
Delaware Corporation, as a nominal  
Defendant,

Defendants.

**NO. 2:20-cv-00236-RSM**

**STIPULATED MOTION AND  
ORDER FOR EXTENSION OF  
CERTAIN DEADLINES**

WHEREAS, on April 7, 2020, the Court issued an Order Setting Trial Date and Related Dates (Dkt. No. 27);

WHEREAS, in Part B of the parties' Joint Status Report and Discovery Plan the parties jointly represented to the Court the perceived difficulties in their scheduling needs due to the unprecedented effects of the COVID-19 pandemic and their commitment to work cooperatively with one another to accommodate each other during these unprecedented times (Dkt. No. 24);

WHEREAS, due to the continued unprecedented effects of the COVID-19 pandemic, and the challenges and difficulties associated with conducting discovery while Washington's

1 stay-at-home order was in effect and while each parties' attorneys' physical offices continues  
 2 to remain closed as of present, the parties believe that a change to the dates and schedule  
 3 previously set by the Court and agreed to by the parties is necessary;

4 WHEREAS, the parties have agreed to extend certain deadlines due to the due to the  
 5 challenges and difficulties associated with conducting discovery and other impacts associated  
 6 with COVID 19;

7 WHEREAS, the parties believe that the Court is well acquainted with the circumstances  
 8 of this national health emergency, and is more than likely aware of the general nature of the  
 9 impact on law firms during this uncertain time; however, should the Court require declarations  
 10 explaining the impact of the COVID-19 pandemic of their respective counsel's law firms, the  
 11 parties are more than willing to articulate specific circumstances supporting good cause for  
 12 this modification.

13 IT IS HEREBY STIPULATED AND AGREED by and through the undersigned  
 14 counsel for Plaintiff and Defendant, in accordance with LCR 7(d)(1) and 10(g), subject to the  
 15 approval of the Court, that trial be continued from April 5, 2021 to August 2, 2021 or as soonest  
 16 thereafter as the Court permits, and the deadlines in the shall be modified as set forth below:

Event Title	Current Deadline	Proposed Amended Deadline
<b>JURY TRIAL DATE</b>	<b>April 5, 2021</b>	<b>August 2, 2021</b>
All Motions Related to non-expert Discovery must be filed by (see LCR 7(d))	November 6, 2020	January 27, 2021
Disclosure of Expert Testimony under FRCP 26(a)(2)	(expert disclosures: October 7, 2020;	March 5, 2021
Discovery Completed by	December 7, 2020	April 30, 2021

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 Case No. **2:20-cv-00236-RSM**

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All dispositive motions must be filed by and noted on the motion calendar no later than the fourth Friday thereafter (see LCR 7(d))	January 5, 2021	May 7, 2021
Mediation per LCR 39.1(c)(3), <b>if requested by the parties</b> , held no later than	February 19, 2021	June 18, 2021
All motions in limine must be filed by and noted on the motion calendar no later than the THIRD Friday thereafter	March 8, 2021	July 9, 2021
Agreed pretrial order due	March 24, 2021	July 21, 2021
Pretrial conference to be scheduled by the Court.		
Trial briefs, proposed voir dire questions, jury instructions, neutral statement of the case, and trial exhibits due	March 31, 2021	July 28, 2021

DATED this 11<sup>th</sup> day of September, 2020.

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*Attorneys for Plaintiff Scott*

*Attorney for Defendants Carr and Vita*

**ORDER**

Based on the foregoing, IT IS SO ORDERED.

DATED this 14<sup>th</sup> day of September, 2020.



RICARDO S. MARTINEZ  
CHIEF UNITED STATES DISTRICT JUDGE

***Presented by:***

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